



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.

Activity No.: PER20050009

Agency Interest No.: 1255

Mr. Jonathon Manns
Works Manager
PPG Industries, Inc.
P. O. Box 1000
Lake Charles, LA 70602

RE: Operating permit, Lake Charles Complex – Incinerators Area, PPG Industries, Inc., Lake Charles, Calcasieu Parish, Louisiana

Dear Mr. Manns:

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the 21st of February, 2010 unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2007.

Permit No.: 2040-V1

Sincerely,

Chuck Carr Brown Ph.D.

Assistant Secretary

CCB:QMZ

c: EPA Region VI

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

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**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**LAKE CHARLES COMPLEX – INCINERATORS AREA
AGENCY INTEREST NO. 1255
PPG INDUSTRIES, INC.
LAKE CHARLES, CALCASIEU PARISH, LOUISIANA**

I. Background

PPG Industries Inc.'s Lake Charles Complex is located at the intersection of I-10 and Loop I-210 near Westlake, Louisiana. The Lake Charles Complex is organized into the following units/areas: VC Production, Power/Utilities, Silicas, Complex, Chlor/Alkali Plant, Mercury Cells, Membrane Unit, Derivatives Shipping, Derivatives, Wastewater Treatment Facilities, Greater EDC, Waste Recovery Unit, Per/Tri, TE-2, and Incinerators Area.

This is the Part 70 operating permit modification to Permit No. 2040-V0, issued February 21, 2005, for the Incinerators Area.

II. Origin

A permit application and Emission Inventory Questionnaire dated May 7, 2005 were submitted by PPG Industries Inc. a Part 70 operating permit modification for above referenced facility. Additional information dated November 30, 2005 was also received.

III. Description

PPG Industries Inc. (PPG) uses two incinerators, a halogen acid furnace, and a thermal oxidizer to destroy chemical wastes generated from the various chemical processes at the Lake Charles Complex. These wastes consist of routinely produced light and heavy ends from chlorinated hydrocarbon production units, process exhaust gases from these same units, and small amounts of other wastes generated onsite. These combustion devices are equipped with control systems that shut off waste feeds in the event of unsatisfactory operating conditions. This area is referred as "Incinerators Area" for easy reference.

Waste Streams

Gaseous vents from process units throughout the Derivatives Plant are fed into the combustion devices to minimize atmospheric emissions of chlorinated hydrocarbons.

Liquid waste streams are also processed in the No. 1 and No. 2 Incinerators and No. 3 Halogen Acid Furnace (HAF). The majority of these streams are chlorinated hydrocarbon wastes.

Other liquid waste streams include liquid wastes from the production facility and used oils contaminated with chlorinated hydrocarbons. Miscellaneous off-specification chlorinated hydrocarbon products, stabilizers, tank cleanings, process additives, aqueous waste, and waste oil can also be fed directly into the incinerators for thermal destruction.

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No. 1 and No. 2 Incinerators

The No. 1 and No. 2 Incinerators are identically designed, horizontally fired units. Each incinerator unit is capable of handling heat release rate of 48 MM BTU/hour while burning liquid hazardous wastes, vent gases, and auxiliary fuel and is attached directly to a primary scrubber designed to use water as the scrubbing medium for removal of HCl. The cooled combustion gas stream is discharged through the top of the primary scrubber towers into a common manifold header and delivered to a common secondary scrubber, which uses a sodium hydroxide solution to remove halogens from the gas stream.

The flue gas from the secondary scrubber is discharged to a common tertiary scrubber. The tertiary scrubber is an FRP tower with a venturi scrubbing section followed by a demister section. This scrubber is used to remove particulate matter from the flue gas stream. The gases leaving the tertiary scrubber pass through an exhaust stack and are continuously analyzed for CO and O₂ prior to release to the atmosphere.

The No. 1 and No. 2 Incinerators are permitted under TSCA standards to destroy PCB (polychlorinated biphenyl) contaminated wastes.

No. 3 Halogen Acid Furnace (HAF)

The No. 3 HAF is horizontally fired industrial furnace with a design heat release rate of 70 MM BTU/hour while burning liquid hazardous wastes, vent gases, and auxiliary fuel. The No. 3 HAF is permitted under RCRA standards as a Boiler and Industrial Furnace (BIF), Halogen Acid Furnace (HAF) and under TSCA standards to destroy PCB (polychlorinated biphenyl) contaminated wastes.

The combustion chamber is connected directly to a waste heat recovery boiler that cools the combustion gas stream using a fire-tube exchanger and produces steam for utility purposes. Cooled combustion gases leaving the waste heat boiler enter the acid (HCl) absorber. This absorber is designed to recover HCl from the combustion gases for recovery and reuse within the Lake Charles Complex. Exhaust gases from the absorber are routed to the secondary scrubber. The secondary scrubber contains a packed scrubbing section that uses a basic solution to remove halogens from the gas stream.

The gases leaving the secondary scrubber pass through an exhaust stack and are continuously analyzed for CO and O₂ prior to release to the atmosphere.

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No. 4 Thermal Oxidizer

The No. 4 Thermal Oxidizer is a horizontally fired combustion device designed to handle a design heat release rate of 48 MM BTU/hour while burning vent gases and auxiliary fuel. This unit attached directly to a primary scrubber designed to use water as the scrubbing medium to remove HCl formed as a product of the combustion process. The primary scrubber is a lined, circular steel tower equipped with a packed scrubbing section.

The cooled combustion gasses are discharged through the top of the primary scrubber tower to the secondary scrubber. The secondary scrubber is a tower with a packed scrubbing section followed by a demister section. This scrubber uses a basic solution to remove halogens from the gas stream.

The gases leaving the secondary scrubber pass through an exhaust stack and are continuously analyzed for CO and O₂ prior to release to the atmosphere.

The incinerators, halogen acid furnace, and thermal oxidizer in this permit have sealed combustion chambers. The vent and process lines are not included in this permit. They are part of the chemical manufacture process units (EDC, TE-2, Vinyl Chloride Production, and others), which are subject to Leak Detect and Repair (LDAR) of 40 CFR 63 Subpart H. 40 CFR 63 Subpart H does not apply to the emissions covered in this permit, which does not include any affected fugitive components.

This modification is to incorporate the results of the consolidated performance test for No. 1 and No. 2 Incinerators. There are no physical or operational changes associated with this permit modification. Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	54.27	75.37	+ 21.10
SO ₂	0.41	0.51	+ 0.10
NO _x	84.10	94.90	+ 10.80
CO	47.41	47.11	- 0.30
VOC	1.45	1.03	- 0.42
Cl ₂	16.30	18.68	+ 2.38
HCl	48.82	35.58	- 13.24

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
1,1,2,2-Tetrachloroethane	0.03	0.03	-

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VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
1,1,2-Trichloroethane	0.04	0.03	- 0.01
1,1-Dichloroethane	< 0.01	0.01	+ 0.01
1,2,4-Trichlorobenzene	0.01	0.01	-
1,2-Dichloroethane	0.14	0.09	- 0.05
1,4-Dichlorobenzene	0.01	0.01	-
2,2'-dichlorodiethyl ether	0.01	0.01	-
Chlorinated Dibenzo-P-Dioxins	7.2E-8	5.3E-8	- 1.9E-8
Chlorinated dibenzofurans	3.4E-6	2.3E-6	- 1.1E-6
Chlorobenzene	-	< 0.01	< 0.01
Chloroethane	0.04	0.02	- 0.02
Chloroform	0.04	0.03	- 0.01
Hexachlorobenzene	0.01	< 0.01	- 0.01
Hexachlorobutadiene	0.01	0.04	+ 0.03
Hexachloroethane	0.02	0.01	- 0.01
Methyl chloride	-	< 0.01	< 0.01
Naphthalene	< 0.01	< 0.01	-
Trichloroethylene	< 0.01	< 0.01	-
Vinyl chloride	0.05	0.04	- 0.01
Vinyldene chloride	< 0.01	< 0.01	-
Total	0.41	0.33	- 0.08
Other VOC (TPY):		0.65	

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) review does not apply.

This facility is part of a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg.

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8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 2007; and in the <local paper>, <local town>, on <date>, 2007. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: AERMOD ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
NO _X	Annual	2.879 µg	(100 µg)
Cl ₂	8-hour	14.496 µg	35.7 µg

VIII. General Condition XVII Activities

Work Activity	Schedule	Emission Rates – tons/year
Emissions from Disconnecting Loading/Unloading Hoses		VOCs: < 0.01
Clearing Pumps		VOCs: < 0.01; Non-VOC TAPs: < 0.01
Clearing Piping		VOCs: < 0.01; Non-VOC TAPs: < 0.01
Clearing Instruments		Non-VOC TAPs: < 0.01

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IX. Insignificant Activities

<u>ID No.</u>	<u>Description</u>	<u>Citation</u>
	Antifoulant Storage Tank (1,200 gal)	[LAC 33:III.501.B.5.A.3]
	Portable Heaters (< 1 MM BTU/hr each)	[LAC 33:III.501.B.5.A.5]
	Portable Fuel Tanks	[LAC 33:III.501.B.5.A.8]
	Vent Analyzers	[LAC 33:III.501.B.5.A.9]
	Two (2) Temporary Cooling Towers	[LAC 33:III.501.B.5.A.12]

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																		
		5▲	509	9	11	13	15	2103	2104*	2104*	2107	2113	2115	2116*	2122	22	29*	51*	53*	56
UNF002	Incinerators Area	1		1	1	1					1					1	1	1	1	1
EQT261	345: No. 1 and No. 2 Incinerators /Scrubbers	1			1	1	1													1
EQT392	346: No. 3 HAF/Scrubbers	1			1	1	1													1
EQT393	347: No. 4 Thermal Oxidizer /Scrubbers	1			1	1	1													1

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60 NSPS								40 CFR 61								40 CFR 63 NESHAP								40 CFR	
		A	K	Ka	Kb	Db	Dc	GG	NNN	RRR	A	J	V	A	F	G	H	EEE	68	82							
UNF002	Incinerators Area																1									1	
EQT261	345: No. 1 and No. 2 Incinerators /Scrubbers																									1	
EQT392	346: No. 3 HAF/Scrubbers																									1	
EQT393	347: No. 4 Thermal Oxidizer /Scrubbers																									3	

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT393	40 CFR 63 Subpart EEE – Hazardous Waste Combustors [40 CFR 63.1203]	Does not apply – Burns vent gases only.

The above table provides explanation for both the exemption status and non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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Per 40 CFR 60.6(f) and LAC 33:III.507.I, a permit shield has been determined for the referenced facility as follows:

1. Combustion devices (EQT261, EQT392, and EQT393) are not subject to the requirements of 40 CFR 61 Subpart F – These combustion devices comply with HON Subpart G.
2. Compliance with HON constitutes compliance with LAC 33:III.2103, 2107, and 2115 and NSPS Subparts NNN and RRR for the combustion devices (EQT261, EQT392, and EQT393).

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- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 - 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 - 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and

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4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
 1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
[Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an

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emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]

- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 - 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 - 5. changes in emissions would not qualify as a significant modification; and
 - 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
 - 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

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3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

40 CFR PART 70 GENERAL CONDITIONS

- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated May 7, 2005, along with supplemental information dated November 30, 2005.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

INVENTORIES

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Incinerators Area						
EQT0261	345 - No. 1 and No. 2 Incinerators/Scrubbers			96 MM BTU/hr		8780 hr/yr (All Year)
EQT0392	346 - No. 3 HAF/Scrubbers			70 MM BTU/hr		8780 hr/yr (All Year)
EQT0393	347 - No. 4 Thermal Oxidizer/Scrubbers			48 MM BTU/hr		8780 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Incinerators Area							
EQT0261	345 - No. 1 and No. 2 Incinerators/Scrubbers	40.1	23160	3.5		78	150
EQT0392	346 - No. 3 HAF/Scrubbers	41.7	17891	3		98	110
EQT0393	347 - No. 4 Thermal Oxidizer/Scrubbers	12.1	3564	2.5		99	160

Relationships:

ID	Group Type	Group Description
UNFO002	Unit or Facility Wide	-

Group Membership:

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
1533	Non-Commercial Hazardous Waste Incinerators (Thermal Capacity)	166	MM BTU/Hr
1520	Incinerators; A) 1,000 Lb/Hr and Greater Capacity	1	

SIC Codes:

2819	Industrial Inorganic chemicals, nec	AI1255
2869	Industrial organic chemicals, nec	AI1255

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lbs/hr	Max lbs/hr	Tons/Year												
Incinerators Area															
EQT 0261 345	5.7	24.9	9.4	9.4	41.2	12.2	12.2	14.7	53.6	0.06	0.07	0.25	0.02	1.82	0.09
EQT 0392 346	4.77	20.9	12.0	12.0	52.6	4.85	4.85	21.20	0.03	0.03	0.14	0.11	2.12	0.47	
EQT 0393 347	0.30	1.31	0.25	0.30	1.1	0.13	0.64	0.57	0.03	0.03	0.12	0.11	1.30	0.47	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0261 345	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.001
	1,1,2,2-Tetrachloroethane	0.001	0.002	0.005
	1,1,2-Trichloroethane	0.001	0.002	0.005
	1,1-Dichloroethane	< 0.001	< 0.001	0.001
	1,2,4-Trichlorobenzene	0.001	0.002	0.003
	1,2-Dichloroethane	< 0.001	< 0.001	0.0013
	1,4-Dichlorobenzene	< 0.001	0.001	0.002
	Antimony (and compounds)	0.027	0.027	0.12
	Arsenic (and compounds)	0.027	0.027	0.12
	Barium (and compounds)	0.068	0.068	0.30
	Beryllium (Table 51.1)	0.027	0.027	0.117
	Cadmium (and compounds)	0.018	0.018	0.08
	Carbon tetrachloride	< 0.001	< 0.001	< 0.001
	Chlorinated Dibenzo-P-Dioxins	8.0E-10	8.0E-10	3.5E-9
	Chlorinated dibenzofurans	1.3E-8	1.3E-8	5.5E-8
	Chlorine	2.4	2.4	10.3
	Chlorobenzene	< 0.001	< 0.001	< 0.001
	Chloroethane	< 0.001	< 0.001	0.001
	Chloroform	< 0.001	< 0.001	< 0.001
	Chromium VI (and compounds)	0.012	0.012	0.05
	Cobalt compounds	0.027	0.027	0.12
	Copper (and compounds)	0.040	0.040	0.17
	Hexachlorobenzene	< 0.001	< 0.001	0.001
	Hexachlorobutadiene	0.003	0.004	0.012
	Hexachloroethane	0.001	0.001	0.003
	Hydrochloric acid	0.12	0.12	0.5
	Lead compounds	0.018	0.018	0.08
	Manganese (and compounds)	0.027	0.027	0.12
	Mercury (and compounds)	0.010	0.010	0.046
	Methyl chloride	< 0.001	< 0.001	< 0.001
	Naphthalene	< 0.001	< 0.001	< 0.001
	Nickel (and compounds)	0.026	0.026	0.11
	Selenium (and compounds)	0.018	0.018	0.080
	Tetrachloroethylene	0.002	0.003	0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0261 345	Trichloroethylene	< 0.001	0.001	0.002
	Vinyl chloride	< 0.001	1.765	0.002
	Vinylidene chloride	< 0.001	0.001	0.002
	Zinc (and compounds)	0.07	0.07	0.30
EQT 0392 346	1,1,1-Trichloroethane	0.001	0.001	0.003
	1,1,2,2-Tetrachloroethane	0.003	0.005	0.02
	1,1,2-Trichloroethane	0.005	0.007	0.02
	1,1-Dichloroethane	< 0.001	< 0.001	0.001
	1,2,4-Trichlorobenzene	0.001	0.001	0.004
	1,2-Dichloroethane	< 0.009	< 0.014	0.04
	1,4-Dichlorobenzene	0.001	0.002	0.01
	2,2'-dichlorodiethyl ether	0.001	0.002	0.005
	Antimony (and compounds)	0.001	0.001	0.002
	Arsenic (and compounds)	0.001	0.001	0.005
	Barium (and compounds)	0.001	0.001	0.003
	Beryllium (Table 51.1)	< 0.001	< 0.001	0.001
	Cadmium (and compounds)	< 0.001	< 0.001	0.001
	Chlorinated Dibenzo-P-Dioxins	1.0E-8	1.0E-8	4.5E-8
	Chlorinated dibenzofurans	4.8E-7	4.8E-7	2.1E-6
	Chlorine	0.91	0.91	4.0
	Chlorobenzene	< 0.001	< 0.001	0.001
	Chloroethane	0.003	0.005	0.01
	Chloroform	0.001	0.002	0.005
	Chromium VI (and compounds)	0.001	0.001	0.004
	Cobalt compounds	< 0.001	< 0.001	0.001
	Copper (and compounds)	0.001	0.001	0.003
	Hexachlorobenzene	0.001	0.001	0.003
	Hexachlorobutadiene	0.007	0.010	0.03
	Hexachloroethane	0.002	0.004	0.011
	Hydrochloric acid	7.0	7.00	30.7
	Lead compounds	0.002	0.002	0.009
	Manganese (and compounds)	< 0.001	< 0.001	0.001
	Mercury (and compounds)	< 0.001	< 0.001	0.002
	Naphthalene	0.001	< 0.001	< 0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0392 346	Nickel (and compounds)	< 0.001	< 0.001	0.001
	Selenium (and compounds)	< 0.001	< 0.001	0.001
	Tetrachloroethylene	0.018	0.012	0.05
	Trichloroethylene	< 0.001	< 0.001	< 0.001
	Vinyl chloride	0.001	1.40	0.002
	Vinylidene chloride	< 0.001	< 0.001	< 0.001
	Zinc (and compounds)	< 0.001	< 0.001	0.001
EQT 0393 347	1,1,1-Trichloroethane	< 0.001	0.001	0.002
	1,1-Dichloroethane	0.001	0.001	0.003
	1,2-Dichloroethane	0.011	0.013	0.05
	Chlorinated Dibenzo-P-Dioxins	9.0E-10	9.0E-10	4.0E-9
	Chlorinated dibenzofurans	2.3E-8	2.3E-8	1.0E-7
	Chlorine	1.00	1.50	4.38
	Chloroethane	0.003	0.004	0.01
	Chloroform	0.006	0.007	0.02
	Hydrochloric acid	1.00	2.00	4.38
	Tetrachloroethylene	< 0.001	< 0.001	0.001
	Trichloroethylene	< 0.001	< 0.001	0.001
UNF 0002	Vinyl chloride	0.009	1.13	0.04
	1,1,1-Trichloroethane			0.01
	1,1,2,2-Tetrachloroethane			0.03
	1,1,2-Trichloroethane			0.03
	1,1-Dichloroethane			0.01
	1,2,4-Trichlorobenzene			0.01
	1,2-Dichloroethane			0.09
	1,4-Dichlorobenzene			0.01
	2,2'-dichlorodiethyl ether			0.01
	Antimony (and compounds)			0.12
	Arsenic (and compounds)			0.13
	Barium (and compounds)			0.30
	Beryllium (Table 51.1)			0.12
	Cadmium (and compounds)			0.08
	Carbon tetrachloride			< 0.01
	Chlorinated Dibenzo-P-Dioxins			5.3E-8

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
UNF 0002	Chlorinated dibenzofurans			2.3E-6
	Chlorine			18.68
	Chlorobenzene			< 0.01
	Chloroethane			0.02
	Chloroform			0.03
	Chromium VI (and compounds)			0.05
	Cobalt compounds			0.12
	Copper (and compounds)			0.17
	Hexachlorobenzene			< 0.01
	Hexachlorobutadiene			0.04
	Hexachloroethane			0.01
	Hydrochloric acid			35.58
	Lead compounds			0.09
	Manganese (and compounds)			0.12
	Mercury (and compounds)			0.05
	Methyl chloride			< 0.01
	Naphthalene			< 0.01
	Nickel (and compounds)			0.11
	Selenium (and compounds)			0.08
	Tetrachloroethylene			0.06
	Trichloroethylene			< 0.01
	Vinyl chloride			0.04
	Vinylidene chloride			< 0.01
	Zinc (and compounds)			0.30

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
Permit Number: 2040-V1
Air - Title V Regular Permit Minor Mod

EQT0261 345: No. 1 and No. 2 Incinerators/Scrubbers

- 1 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). For combustion devices, calculate emission reduction or concentration on a dry basis, corrected to 3-percent oxygen. Subpart G. [40 CFR 63.113(a)(2)]
- 2 [40 CFR 63.120(i)] Which Months: All Year Statistical Basis: None specified Shall comply with all applicable standards set forth in 40 CFR Part 63, Subpart EEE and requirements specified in Appendix A of this permit.
- 3 [40 CFR 63.129] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.
- 4 [40 CFR 63.148(b)(1)(i)] Vapor collection system or closed vent system (hard piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
- 5 [40 CFR 63.148(b)(1)(ii)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (hard piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(1)(ii)]
- 6 [40 CFR 63.148(b)(2)(i)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(i)]
- 7 [40 CFR 63.148(b)(2)(ii)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(ii)]
- 8 [40 CFR 63.148(b)(2)(iii)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (ductwork): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(2)(iii)]
- 9 [40 CFR 63.148(b)(3)] Which Months: All Year Statistical Basis: None specified Fixed roof, cover, or enclosure: Presence of a leak monitored by visual, audible, and/or olfactory once initially and once every six months as specified in 40 CFR 63.133 through 63.137. Subpart G. [40 CFR 63.148(b)(3)]
- 10 [40 CFR 63.148(i)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). Subpart G. [40 CFR 63.148(i)]
- 11 [LAC 33.III.110.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- 12 [LAC 33.III.131.C] Which Months: All Year Statistical Basis: None specified Opacity <= 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- 13 [LAC 33.III.151] Which Months: All Year Statistical Basis: Six-minute average Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33.III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
 Activity Number: PER20050009
 Permit Number: 2040-V1
 Air - Title V Regular Permit Minor Mod

EQT0261 345: No. 1 and No. 2 Incinerators/Scrubbers

- 14 [LAC 33:III.501.C.6] Alarms shall be set to sound when the temperature for vent gas incineration, stack CO concentration, stack pH are outside the parameter values for these incinerators. Corrective action shall be taken any time an alarm is sounded. Monitoring records of alarms and corrective actions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. Frequent or excessive instances of operating parameter excursions may be considered as indicative of failure to properly maintain or operate the equipment, and may be considered a violation of the permit - State only.
- 15 [LAC 33:III.501.C.6] The incinerators and associated equipment (pumps, valves, pipes, etc.) must be visually inspected, at least daily, for leaks, spills, and signs of tampering. Problems shall be addressed to minimize any fugitive emissions. Records shall be maintained onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division - State Only.

The tertiary scrubber for No. 1 and No. 2 Incinerators will be shutdown occasionally for routine maintenance. During the maintenance periods, these incinerators may be operating in the vent gas mode (non-hazardous waste) using only the primary and secondary scrubber systems. (Liquid feed is not allowed during these tertiary scrubber maintenance periods.) The No. 1 and No. 2 Incinerators shall meet all applicable requirements of HON (40 CFR 63 Subpart G) for process vents, storage vessels, transfer racks, and wastewater during these maintenance periods.

Control device that meets the control requirements of HON Subpart G - Determined as MACT.

EQT0392 346: No. 3 HAF/Scrubbers

- 18 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). For combustion devices, calculate emission reduction or concentration on a dry basis, corrected to 3-percent oxygen. Subpart G. [40 CFR 63.113(a)(2)]
- 19 [40 CFR 63.114(e)] Which Months: All Year Statistical Basis: None specified The operating parameters required by 40 CFR 63.114(e) for this furnace are specified below:
 Minimum combustion chamber temperature: 1,800 F,
 Minimum liquid gas ratio for secondary scrubber: 12 gal/MSCF,
 Minimum secondary scrubber effluent pH: 8.5.
 The minimum data availability requirements for such operating parameters shall be in accordance with 40 CFR 63, Subparts A and G. [40 CFR 63.114(e)]
- 20 [40 CFR 63.1200] Phase II source. Shall comply with 40 CFR 63 Subpart EEE by October 14, 2008 or by the revised compliance date if applicable.
- 21 [40 CFR 63.129] Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.
- 22 [40 CFR 63.148(b)(1)(i)] Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]
- 23 [40 CFR 63.148(b)(1)(ii)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(1)(ii)]
- 24 [40 CFR 63.148(b)(2)(i)] Which Months: All Year Statistical Basis: None specified Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(i)]

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

EQT0392 346: No. 3 HAF/Scrubbers

- 25 [40 CFR 63.148(b)(2)(ii)] Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(ii)]
- Which Months: All Year Statistical Basis: None specified
- Vapor collection system or closed vent system (ductwork): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(2)(iii)]
- Which Months: All Year Statistical Basis: None specified
- Fixed roof, cover, or enclosure: Presence of a leak monitored by visual, audible, and/or olfactory once initially and once every six months as specified in 40 CFR 63.133 through 63.137. Subpart G. [40 CFR 63.148(b)(3)]
- Which Months: All Year Statistical Basis: None specified
- Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.148(i)(1) through (i)(6). Subpart G. [40 CFR 63.148(i)]
- Opacity < 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing; charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- Which Months: All Year Statistical Basis: None specified
- Opacity < 20 percent, except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
- Which Months: All Year Statistical Basis: Six-minute average
- Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33.III.Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA, on request.
- The furnace and associated equipment (pumps, valves, pipes, etc.) must be visually inspected, at least daily, for leaks, spills, and signs of tampering. Problems shall be addressed to minimize any fugitive emissions. Records shall be maintained onsite and available for inspection by the Office of Environmental Compliance, Surveillance Division - State Only.
- Until the initial NOC for compliance with 40 CFR Part 63, Subpart EEE is submitted, alarms shall be set to sound when the temperature for vent gas incineration, stack CO concentration, and alkali solution pH are outside the parameter values for this furnace.
- Corrective action shall be taken any time an alarm is sounded. Monitoring records of alarms and corrective actions shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. Frequent or excessive instances of operating parameter excursions may be considered as indicative of failure to properly maintain or operate the equipment, and may be considered a violation of the permit - State only.
- 26 [40 CFR 63.148(b)(2)(iii)]
- 27 [40 CFR 63.148(b)(3)]
- 28 [40 CFR 63.148(i)]
- 29 [LAC 33.III.1101.B]
- 30 [LAC 33.III.1311.C]
- 31 [LAC 33.III.1513]
- 32 [LAC 33.III.501.C.6]
- 33 [LAC 33.III.501.C.6]

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
Permit Number: 2040-A1
Air - Title V Regular Permit Minor Mod

EQT0392 346: No. 3 HAF/Scrubbers

34 [LAC 33:III.501.C.6] When processing liquid waste, until the initial NOC for compliance with 40 CFR Part 63, Subpart EEE is submitted, the operating conditions shall be controlled as specified below:

Maximum liquid feed rate: 8,566 lb/hr,

Maximum total chlorine feed rate: 8,412 lb/hr,

Minimum temperature for liquid incineration: 2,124 F,

Maximum stack CO concentration (one-hour rolling average): 100 ppmv,

Minimum stack O₂ concentration (dry basis): 2%

The hazardous waste liquid feed shall be automatically cut off if the stack CO concentration or O₂ concentration drifts out of the range for any continuous average period (15-minute averaging period for O₂ or one-hour averaging period for CO) - State only.
Control device that meets the control requirements of HON Subpart G - Determined as MACT.

EQT0393 347: No. 4 Thermal Oxidizer/Scrubbers

36 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). For combustion devices, calculate emission reduction or concentration on a dry basis, corrected to 3-percent oxygen. Subpart G. [40 CFR 63.113(a)(2)]

Which Months: All Year Statistical Basis: None specified

The operating parameters required by 40 CFR 63.114(e) for this thermal oxidizer are specified below:
Minimum combustion chamber temperature: 2,200 F,

Minimum liquid/gas ratio for primary scrubber: 35 gal/MSCF,

Minimum liquid/gas ratio for secondary scrubber: 5 gal/MSCF,

Minimum secondary scrubber effluent pH: 8.0.

The minimum data availability requirements for such operating parameters shall be in accordance with 40 CFR 63, Subparts A and G. [40 CFR 63.114(e)]

Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.

Vapor collection system or closed vent system (hard-piping): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(1)(i)]

Which Months: All Year Statistical Basis: None specified
Vapor collection system or closed vent system (hard-piping): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(1)(ii)]

Which Months: All Year Statistical Basis: None specified
Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 once initially according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(i)]

Which Months: All Year Statistical Basis: None specified
Vapor collection system or closed vent system (ductwork): Organic HAP monitored by 40 CFR 60, Appendix A, Method 21 annually according to the procedures in 40 CFR 63.148(c). Subpart G. [40 CFR 63.148(b)(2)(ii)]

Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
 Activity Number: PER20050009
 Permit Number: 2040-V1
 Air - Title V Regular Permit Minor Mod

EQT0393 347: No. 4 Thermal Oxidizer/Scrubbers

- Vapor collection system or closed vent system (ductwork): Presence of a leak monitored by visual, audible, and/or olfactory annually. Subpart G. [40 CFR 63.148(b)(2)(iii)]
 Which Months: All Year Statistical Basis: None specified
 Fixed roof, cover, or enclosure: Presence of a leak monitored by visual, audible, and/or olfactory once initially and once every six months as specified in 40 CFR 63.133 through 63.137. Subpart G. [40 CFR 63.148(b)(3)]
 Which Months: All Year Statistical Basis: None specified
 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in 40 CFR 63.148((i)) through (i)(6). Subpart G. [40 CFR 63.148(i)]
 Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel).
 Which Months: All Year Statistical Basis: Six-minute average
 Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Record and keep on site for at least two years the data required to demonstrate exemption from the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request.
 The operating conditions shall be controlled as specified below:
 Maximum total chlorine feed rate: 4,120 lb/hr,
 Maximum stack CO concentration (one-hour rolling average): 100 ppmv,
 Minimum stack O₂ concentration (dry basis): 2%
 - State only.
 Control device that meets the control requirements of HON Subpart G - Determined as MACT.

UNF0002 Incinerators Area

- All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
 Incinerators Ares is part of a facility (Lake Charles Complex) that is subject to the requirements of 40 CFR 68.
 Submit Title V permit application for renewal: Due 6 months before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
Permit Number: 2040-V1
Air - Title V Regular Permit Minor Mod

UNF0002 Incinerators Area

- 55 [40 CFR 70.6(a)(3)(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. [40 CFR 70.6(a)(3)(iii)(B)]
- 56 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 57 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 58 [LAC 33:III.1301.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 59 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 60 [LAC 33:III.2191] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 61 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 62 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 63 [LAC 33:III.501.C.6] Each vent gas stream shall be analyzed annually to determine the vent gas composition. This analysis shall be used (individually or in combination with other analysis) to determine VOC and toxic emissions. Records of this analysis shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division - State only.
- 64 [LAC 33:III.501.C.6] Except for breakdowns and repairs, calibration checks, and zero and span adjustments, all continuous monitoring systems shall be in continuous operation while feeding hazardous waste liquid and vent gases and shall meet minimum frequency of operation requirements. Continuous analyzers shall be installed, maintained, and calibrated to provide a continuous record of CO, O₂, and vinyl chloride concentrations in the stack stream. These analyzers shall meet the performance specifications 2, 3, and 4 of 40 CFR 60, Appendix B - State only. For purposes of any operating parameters for which an "operating day" is required to be established under 40 CFR 63, the "operating day" will be 7:00 a.m. to 6:59 a.m.
- 65 [LAC 33:III.501.C.6] Permittee shall analyze each waste feed annually or, for liquid waste subject to 40 CFR 63 Subpart EEE, as specified in the feed system analysis plan for 40 CFR 63 Subpart EEE for toxic air pollutants (including toxic metals). These results shall be used to quantify and speculate the toxic metal emissions. Records shall be maintained on site and available for inspection by the Office of Environmental Compliance, Surveillance Division - State only.

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
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Air - Title V Regular Permit Minor Mod

UNF0002 Incinerators Area

67 [LAC 33:III.501.C.6] The combustor devices shall be shut down if any of the following occurs:

- 1) Loss of induced draft fan.
- 2) Power outage.
- 3) Loss of instrument air.
- 4) Loss of secondary scrubber media recirculation flow.

State only.

Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.

Do not cause a violation of any ambient air standard listed in LAC 33:III.T.Table 51.2, unless operating in accordance with LAC 33:III.5109.

Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.

Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A.

Submit Annual Emissions Report (TEDI): Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.

Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations"

Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:1.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:1.3923.

Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:1.3931, except as provided in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:I.3923.

68 [LAC 33:III.5105.A.1]

69 [LAC 33:III.5105.A.2]

70 [LAC 33:III.5105.A.3]

71 [LAC 33:III.5105.A.4]

72 [LAC 33:III.5107.A.2]

73 [LAC 33:III.5107.A.3]

74 [LAC 33:III.5107.B.1]

75 [LAC 33:III.5107.B.2]

76 [LAC 33:III.5107.B.3]

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
Permit Number: 2040-V1
Air - Title V Regular Permit Minor Mod

UNF0002 Incinerators Area

- 77 [LAC 33:III.5107.B.4] Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.i through viii.
- Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 79 [LAC 33:III.5109.B.3] Achieve compliance with ambient air standards unless it can be demonstrated to the satisfaction of DEQ that compliance with an ambient air standard would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology.
- Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112.Table 51.2.
- 80 [LAC 33:III.5109.B] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department.
- 82 [LAC 33:III.5113.A.1] Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 83 [LAC 33:III.5113.A.2] Submit notification in writing: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC, within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 84 [LAC 33:III.5113.B.1] Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel.
- 85 [LAC 33:III.5113.B.3] Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department.
- 86 [LAC 33:III.5113.B.4] Provide emission testing facilities as specified in LAC 33:III.5113.B.4.a through e.
- 87 [LAC 33:III.5113.B.5] Analyze samples and determine emissions within 30 days after each emission test has been completed.
- 88 [LAC 33:III.5113.B.5] Submit certified letter: Due to the Office of Environmental Assessment, Air Quality Assessment Division, before the close of business on the 45th day following the completion of the emission test. Report the determinations of the emission test.
- 89 [LAC 33:III.5113.B.6] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ.
- 90 [LAC 33:III.5113.B.7] Submit notification in writing: Due to the Office of Environmental Assessment, Air Quality Assessment Division, at least 30 days before the emission test.
- 91 [LAC 33:III.5113.C.1] Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test.
- 92 [LAC 33:III.5113.C.2] Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence.
- Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ.

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex
Activity Number: PER20050009
Permit Number: 2040-V1
Air - Title V Regular Permit Minor Mod

UNF002 Incinators Area

- 93 [LAC 33:III.5113.C.2] Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin.
- 94 [LAC 33:III.5113.C.2] Submit performance evaluation report: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 60 days of the monitoring system performance evaluation.
- 95 [LAC 33:III.5113.C.3] Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems.
- 96 [LAC 33:III.5113.C.5.a] Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, appendix B.
- 97 [LAC 33:III.5113.C.5.a] Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days.
- 98 [LAC 33:III.5113.C.5.d] Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS.
- 99 [LAC 33:III.5113.C.5.e] Collect and reduce all data as specified in LAC 33:III.5113.C.5.e.i and ii, if required to install a CMS.
- 100 [LAC 33:III.5113.C.5] Submit plan: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system.
- 101 [LAC 33:III.5113.C.7] Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ.
- 102 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.
- 103 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611.Table 6 when the administrative authority declares an Air Pollution Warning.
- 104 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 105 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 106 [LAC 33:III.5611.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- 107 [LAC 33:III.5611.B] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 108 [LAC 33:III.5901] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- Incinerators Area is part of a facility (Lake Charles Complex) that is subject to the requirements of LAC 33:III Chapter 59.

SPECIFIC REQUIREMENTS

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20050009

Permit Number: 2040-V1

Air - Title V Regular Permit Minor Mod

UNF0002 Incinerators Area

109 [LAC 33:II.919.D]

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

APPENDIX A. MACT REQUIREMENTS

LAKE CHARLES COMPLEX – INCINERATORS AREA AGENCY INTEREST NO. 1255 PPG INDUSTRIES, INC. LAKE CHARLES, CALCASIEU PARISH, LOUISIANA

The No. 1 and No. 2 Incinerators (EQT261) are regulated under the National Emission Standards for Hazardous Air Pollutants (NESHAP) from Hazardous Waste Combustors (40 CFR 63 Subpart EEE). The standards required by this rule are based on maximum achievable control technology (MACT). Compliance with the MACT performance standards and emission limits of this Subpart is determined by conducting Comprehensive Performance Tests (CPTs) as required by 40 CFR 63.1207. Performance tests are also done to determine feed rate limits, operating parameter limits, and to demonstrate the performance of the continuous monitoring system as required by 40 CFR 63.1209.

The permittee shall conduct all performance testing at the frequencies specified in 40 CFR 63.1207(d). Within 90 days of completion of the CPT, the permittee shall postmark and submit to the LDEQ, a Notification of Compliance (NOC) documenting compliance with the emission standards and continuous monitoring system requirements, and identifying operating parameter limits under 40 CFR 63.1209 [40 CFR 63.1207(j)].

The No. 1 and No. 2 Incinerators shall operate within the operating parameters and limits established by the September 2004 CPT and the March 2007 additional test. The established operating parameters and limits from the CPT are included in the revised NOC which is currently dated May 29, 2007. In accordance with 40 CFR 63.1206(c)(1), the operating parameter limits from the NOC are incorporated in the Title V permit. (See table below.) The next CPT must commence no later than 61 months after the date of commencement of the previous CPT, per 40 CFR 63.1207(d)(1). Upon completion of the next CPT and along with the issuance of the corresponding NOC, the permittee shall submit to the LDEQ a permit modification application to modify the current permit with the most current operating parameters and limits from the most recent NOC.

PPG Industries, Inc. – Lake Charles, LA
Part 70 Operating Permit Limits
LAD 008086505; AI #1255

No. 1 and 2 Incinerator Operating Parameter Limits

Operational Parameter	Permitted Limit	Averaging Period ⁽¹⁾	AWFCO
Maximum Liquid Waste Feed Rate (lb/hr) – Incinerator 1	5,340	HRA	Y
Maximum Liquid Waste Feed Rate (lb/hr) – Incinerator 2	5,340	HRA	Y
Maximum Total Chlorine feed rate (lb/hr)	9,635	12-HRA	Y
Maximum Total Ash Feed Rate (lb/hr)	25.8	12-HRA	Y
Mercury Maximum Theoretical Emission Concentration (µg/dscm)	130 ⁽²⁾	12-HRA	Y
Maximum total semivolatile metals (SVM) feed rate (lb/hr)	0.10	12-HRA	Y
Maximum total low volatile metals (LVM) feed rate (lb/hr)	0.122	12-HRA	Y
Minimum Combustion Temperature (°F) – Incinerator 1	2,383	HRA	Y
Minimum Combustion Temperature (°F) – Incinerator 2	2,383	HRA	Y
Maximum Combustion Air Flow Rate (scfh) – Incinerator 1	627,189	HRA	Y
Maximum Combustion Air Flow Rate (scfh) – Incinerator 2	627,189	HRA	Y
Maximum Total Combustion Air Flow Rate (scfh)	1,055,053	HRA	Y
Minimum Primary Scrubber 1 Liquid to Gas Ratio (gal/Mscf)	58	HRA	Y
Minimum Primary Scrubber 2 Liquid to Gas Ratio (gal/Mscf)	58	HRA	Y
Minimum Primary Scrubber 1 Pressure Drop (inwc)	2	HRA	Y
Minimum Primary Scrubber 2 Pressure Drop (inwc)	2	HRA	Y
Minimum Secondary Scrubber Liquid to Gas Ratio (gal/Mscf)	19	HRA	Y
Minimum Secondary Scrubber Pressure Drop (inwc)	0.3	HRA	Y
Minimum Secondary Scrubber Liquid pH	8.5	HRA	Y
Minimum Tertiary Scrubber Liquid to Gas Ratio (gal/Mscf)	28	HRA	Y
Minimum Tertiary Scrubber Pressure Drop (inwc)	20	HRA	Y
Minimum Tertiary Scrubber Blowdown Rate (gpm)	10	HRA	Y
Maximum Stack Gas CO (ppmv, dry @7%O ₂)	100	HRA	Y
Minimum Waste Atomizing Fluid Pressure (psig) – Incinerator 1	15	HRA	Y
Minimum Waste Atomizing Fluid Pressure (psig) – Incinerator 2	15	HRA	Y

(1) HRA is hourly rolling average; 12-HRA is 12 hour rolling average

(2) Corrected to 7% oxygen.

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	PPG Industries, Inc.	AI #:	1255	TEMPO Activity No:	PER20050009
Facility Name:	Lake Charles Complex – Incinerators Area	Remarks Submitted by:	PPG Industries, Inc. (Stephen Miller, Don Johnson, Esther Liggio, Don Pearson, Hyun Brosset, Ryan Giggar, Adam Muehlhauser, Craig Davis, Billy Salter) Maureen Harbour, Kean, Miller (counsel to PPG)		
Permit Writer:	Qingming Zhang	Permit Writer Email address:	Qingming.zhang@la.gov		

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – *DO NOT COMPLETE THIS SECTION* This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Cover Letter	The cover letter should be addressed to Mr. Jonathon Manns, rather than Mr. Richard Holliday, as Mr. Manns is now the Plant Manager since Mr. Holliday retired.	Updated the cover letter as requested.
Cover Letter	The cover letter salutation should read: Dear Mr. Manns.	Updated the cover letter salutation as requested.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis Section II Facility and Current Permit Status	The Membrane Unit should be included in the list of unit names / areas on page 2 of the Statement of Basis	The Membrane Unit is added in the list of unit/area as requested.
Statement of Basis Section V Permit Shield	<p>The Statement of Basis incorrectly states that there is no permit shield requested as part of this modification. PPG did request a permit shield, as discussed herein. DEQ is proposing to grant the shield with respect to two of the three requested items. As discussed below, PPG believes a shield should be granted for the third item as well. In any case, the Statement of Basis should be revised. DEQ must either grant the shield as requested or explain in the Statement of Basis why it is not granting the requested shield.</p> <p>In addition, PPG requests that DEQ state in the public notice of the draft permit that a permit shield is included. This statement is required to be in the public notice per LAC 33:III.507.1.</p>	<p>The Statement of Basis correctly states that no new permit shield item is added.</p>
Air Permit Briefing Sheet Section I Background	In the second sentence of the first paragraph, the Membrane Unit should be included in the list of unit/areas. The Membrane Unit has a title V permit and anticipated to commence operation in June 2007.	The Membrane Unit is added in the list of unit/area as requested.
Air Permit Briefing Sheet Section I Background	<p>A sentence should be added to the description for No. 1 and No. 2 Incinerators stating:</p> <p>"No. 1 and No. 2 Incinerators are permitted under TSCA standards to destroy PCB (polychlorinated biphenyl) contaminated wastes."</p>	<p>The description for No. 1 and No. 2 Incinerators is updated to indicate that these incinerators are permitted under TSCA standards to destroy PCB (polychlorinated biphenyl) contaminated wastes.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Air Permit Briefing Sheet III Description	The word "under" is misspelled in the last sentence of the first paragraph describing No. 3 Halogen Acid Furnace (HAF).	The typo is corrected.
Air Permit Briefing Sheet III Description	In the Emission estimate table, the PM ₁₀ After and PM ₁₀ Change emissions should be 75.37 and 21.10.	The emission rates are corrected as requested.
Air Permit Briefing Sheet III Description	Please refer to the comments below on the Emission Rates for Criteria Pollutants for more detail.	The "VOC After" and "VOC Change" are 1.03 and -0.42.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Shield	<p>In accordance with LAC 33:III.507.I.1.c, PPG requested a streamlining determination be provided by the department to resolve multiple overlapping federal requirements. Specifically PPG requested that a permit shield be granted to streamline the requirements of the provisions of NESHAP Subparts F and G with the SIP requirements in LAC33:III.Ch.21 as follows:</p> <p>"Compliance with the HON process vents, storage vessels, and transfer operations requirements contained in 40 CFR Part 63, Subparts F and G, including monitoring, reporting and recordkeeping requirements, constitutes compliance with the provisions of LAC 33:III.Ch. 21 [2103, 2107, and 2115]."</p>	<p>This permit is for control devices only. There are no requirements for HON process vents, storage vessels, and transfer operations.</p>
Appendix A. MACT Requirements	<p>PPG again requests that, in accordance with LAC 33:III.501.I.1.c, such a streamlining determination be provided by the department and included in the Permit Shield section of the Incinerators Area Title V permit. The NESHAP rule constitutes maximum achievable control technology (MACT) and is overall more stringent than LAC 33:III.2103 for storage vessels, 2107 for VOC loading operations, and 2115 for process vents.</p> <p>In the first sentence of the first paragraph, the word "from" should be replaced with the word "for".</p>	<p>The word "from" in "National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors" is correct. The quoted line is the title of 40 CFR Part 63, Subpart EEE.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Appendix A. MACT Requirements	<p>This Appendix creates ambiguity with regard to PPG's permit obligations. 40 CFR 63.1207(j)(1) requires that PPG comply with any revisions to the required Subpart EEE operating parameter limits immediately upon postmarking the revised Notification of Compliance Status (NOC) following any comprehensive or confirmatory performance test. However, this condition in the Appendix indicates that PPG must request a Title V permit modification. PPG requests that LDEQ revise the last sentence of Appendix A to read as follows:</p> <p>"Upon completion of the next comprehensive or confirmatory performance test ("CPT") and along with the issuance of the corresponding updated NOC, the permittee shall comply with any revised operating parameter limits stated in the updated NOC as required in 40 CFR 63.1207(j). PPG shall submit a request for an administrative amendment to substitute the revised NOC for the NOC attached to the current Title V permit at the same time it submits the updated NOC. However, PPG shall comply with the revised NOC and such shall constitute compliance with this permit pending incorporation of the administrative amendment."</p>	<p>Per 40 CFR 63.1206(c)(1)(v), the operating parameters specified in the Notification of Compliance will be incorporated in the Title V permit. A permit modification application is required for such incorporation.</p>
Inventories	<p>The Flow Rate for EQT 392 (No. 3 HAF/Scrubbers) should be corrected to 17691 (cubic ft/min-actual) to be consistent with the existing permit and with the application. No modifications were requested to the existing permit with respect to the No. 3 HAF; thus the existing description of the flow rate should not be revised. (PPG believes this was simply a typographical error made by DEQ in converting the permit to the Tempo format).</p>	<p>The typo is corrected as requested.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Pollutants	The VOC (Avg lb/hr) for EQT 261 should be 0.02 rather than 0.01 to be consistent with the permit application.	The rate is corrected.
Emission Rates for Criteria Pollutants	The VOC (Max lb/hr) for EQT 261 should be 1.82 rather than 1.8 to be consistent with the permit application.	The rate is corrected.
Emission Rates for Criteria Pollutants	The VOC (Tons/Year) for EQT 261 should be 0.14 rather than 0.04 to be consistent with the permit application.	The VOC (tons/year) for EQT261 should be 0.09 based on the Backup Calculation in the application. (The hourly average rates of total air toxic VOCs and total other VOCs are 0.008 lb/hr and 0.012 lb/hr, respectively.)
Emission Rates for Criteria Pollutants	The PM10 (Tons/Year) for EQT 392 should be 21.2 rather than 4.85 to be consistent with the permit application.	The rate is corrected.
Emission Rates for Criteria Pollutants	The PM10 total should be 75.37 rather than 59.02 to be consistent with the permit application.	The rate is corrected.
Permit Phase Totals		
Emission Rates for Criteria Pollutants	The VOC total should be 1.08 rather than 0.98 to be consistent with the permit application.	The VOC total is 1.03.
Permit Phase Totals		

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for Criteria Pollutants	PPG requests that DEQ confirm that the "Permit Phase Totals" are provided for information only and are not meant to constitute enforceable emission limits in addition to the individual TPY limits placed on the EIQ points identified in this section of the Permit. This could be done by adding a footnote to these totals. PPG did not request an emissions cap for any of these pollutants. Further, there is no state or federal requirement that necessitates a permit cap of these emissions. PPG also requests that these conditions be labeled as state-only.	The TEMPO permit report has been updated recently, which does not contain the "Permit Phase Totals" any more.
Permit Phase Totals	<p>There is no federally applicable requirement for a cap for any of these pollutants. Individual limits on each point are sufficient to satisfy any federally applicable requirement.</p>	<p>The maximum annual emission rate of the 1,2-Dichloroethane for EQT261 is changed to 0.0013 tons/year.</p>
Emission Rates for TAP/HAP & Other Pollutants	The 1,2-Dichloroethane (Tons/Year) for EQT 261 should be 0.0013 rather than 0.001 to be consistent with the permit application. Leaving off the last significant digit would have the effect of reducing the permitted emissions by nearly 30%. In the alternative, PPG requests a statement by DEQ in the Statement of Basis and/or Response to Comments to the effect that if the permit limit is stated to be 0.001, then there would be no deviation from such limit provided PPG's actual emissions are less than 0.0015 tons per year.	The "<" is removed as requested.
Emission Rates for TAP/HAP & Other Pollutants	The 1,2-Dichloroethane (Avg lb/hr) for EQT 393 should be 0.011 rather than <0.011 to be consistent with the existing permit and the permit application. PPG did not request any modification to the existing permit for emissions from EQT 393, Incinerator No. 4.	

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for TAP/HAP & Other Pollutants	The 1,2-Dichloroethane (Max lb/hr) for EQT 393 should be 0.013 rather than <0.013 to be consistent with the existing permit and the permit application. PPG did not request any modification to the existing permit for emissions from EQT 393, Incinerator No. 4.	The "<>" is removed as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Beryllium (Tons/Year) for EQT 261 should be 0.117 rather than 0.012 to be consistent with the permit application.	The emission rate is corrected as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Chlorobenzene (Tons/Year) for EQT 392 should be 0.001 rather than <0.001 to be consistent with the existing permit and the permit application. PPG did not request any modification to the existing permit for emissions from EQT 392, No. 3 HAF.	The "<>" is removed as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Chloroethane (Max lb/hr) for EQT 392 should be 0.005 rather than <0.005 to be consistent with the existing permit and the permit application. PPG did not request any modification to the existing permit for emissions from EQT 392, No. 3 HAF.	The "<>" is removed as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Selenium (Tons/Year) for EQT 261 should be 0.080 rather than 0.018 to be consistent with the permit application.	The emission rate is corrected as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Selenium (Max lbs/hr) for EQT 261 should be 0.018 rather than 0.080 to be consistent with the permit application.	The emission rate is corrected as requested.
Emission Rates for TAP/HAP & Other Pollutants	The Vinyl Chloride (Tons/Year) for EQT 392 should be 0.002 rather than 0.001 to be consistent with the existing permit and the permit application. PPG did not request any modification to the existing permit for emissions from EQT 392, No. 3 HAF.	The emission rate is corrected as requested.
Emission Rates for TAP/HAP & Other Pollutants Permit Parameter Totals	The Beryllium total should be 0.118 rather than 0.01 to be consistent with the permit application. This total was provided for information only in the permit application and is not considered to be a permit limit nor a request for a permit limit.	The emission rate is corrected as requested.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Emission Rates for TAP/HAP & Other Pollutants Permit Parameter Totals	The Selenium total should be 0.08 rather than 0.02 to be consistent with the permit application. This total was provided for information only in the permit application and is not considered to be a permit limit nor a request for a permit limit.	The emission rate is corrected as requested.
Emission Rates for TAP/HAP & Other Pollutants	PPG requests that the emission limits for all HAPs/TAPs be marked as state-only. There is no federally applicable requirement that requires such emission limits.	LDEQ will revisit this permit report and determine if any change shall be made to it.
Emission Rates for TAP/HAP & Other Pollutants Permit Parameter Totals	PPG requests that DEQ confirm that the "Permit Parameter Totals" are provided for information only and are not meant to constitute enforceable emission limits in addition to the individual TPY limits placed on the EIQ points identified in this section of the Permit. This could be done by adding a footnote to these totals. PPG did not request an emissions cap for any of these pollutants. Further, there is no state or federal requirement that necessitates a permit cap of these emissions.	The TEMPO permit report has been updated recently, which does not contain the "Permit Parameter Totals" any more.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 1, 19, and 39.	In the permit application, PPG requested an exemption from LAC 33:III.1101.B.	<p>The cited requirements indicate that the devices are in compliance with the regulation by using sweet natural gas as fuel. Smoke monitoring is not required.</p> <p>LAC 33:III.1101.B limits smoke density to a numerical opacity limit of 20 % for a 6 minute period out of 60 consecutive minutes. Smoke is the result of incomplete combustion. To the extent that LAC 33:III.1101.B is deemed to require smoke monitoring, PPG requests an exemption from this monitoring requirement. The application of required MACT combustion control systems pursuant to NESHPAP Subparts F, G, and EEE and adequate maintenance preclude smoking by these sources. The sources for which this waiver is sought are the No. 1 and No. 2 incinerators tertiary scrubber vent (EIQ 345), No. 3 HAF secondary scrubber vent (EIQ 346), and No. 4 thermal oxidizer secondary scrubber vent (EIQ 347) listed in the regulatory review section Table C-2 in Appendix C. PPG requests an exemption from these requirements for the No. 1 and No. 2 incinerators tertiary scrubber vent (EIQ 345), No. 3 HAF secondary scrubber vent (EIQ 346), and No. 4 thermal oxidizer secondary scrubber vent (EIQ 347) because these combustion devices comply with MACT requirements that are more stringent with respect to combustion device control than LAC 33:III.1101.B. As is readily apparent, these units have multiple controls on CO, O₂ and other operating parameters to ensure the maximum achievable control of vents and, for EQT 261 and 392, for hazardous wastes</p> <p>PPG again requests that an exemption from LAC 33:III.1101.B be granted for these emission sources. In the alternative, PPG requests a permit shield stating that compliance with NESHPAP Subparts A, F, G, and EEE constitutes compliance with 1101.B.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 2, 20, and 40	In the permit application, PPG requested an exemption from LAC 33:III.1311.C.	<p>The cited requirements indicate that the devices are in compliance with the regulation by using sweet natural gas as fuel.</p> <p>LAC 33:III.1311.C. states that "the emission of particulate matter from any source other than sources covered under Subsection D of this Section shall be controlled so that the shade or appearance of the emission is not denser than 20 percent average opacity (see Table 4, Chapter 15); except the emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes." PPG has emissions of water vapor from the vent of No. 1 and No. 2 incinerator tertiary scrubber, the No. 3 HAF secondary scrubber, and the No. 4 thermal oxidizer secondary scrubber. PPG requests an exemption from these requirements for the No. 1 and No. 2 incinerators tertiary scrubber vent (EIQ 345), No. 3 HAF secondary scrubber vent (EIQ 346), and No. 4 thermal oxidizer secondary scrubber vent (EIQ 347) because these combustion devices comply with MACT requirements that are more stringent with respect to particulate matter emissions than LAC 33:III.1311.C. As is readily apparent, these units have multiple controls on CO, O₂ and other operating parameters to ensure the maximum achievable control of vents and, for EQT 261 and 392, for hazardous wastes and the feed rate limits and particulate control requirements of NESHAP EEE provide a superb level of control for particulate matter.</p> <p>PPG again requests that an exemption from LAC 33:III.1311.C be granted for these emission sources. In the alternative, PPG requests a permit shield stating that compliance with NESHAP Subparts A, F, G, and EEE constitutes compliance with LAC 33:III.Ch. 13.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 5 and 6	<p>PPG requests that these requirements be deleted.</p> <p>It appears that Specific Requirement (SR) 6 is incomplete and is duplicative of SR 5. Further, SR 10 already requires compliance with NESHAP Subpart EEE. In particular, 40 CFR 63.1206(c)(5) and (7) contain requirements for ensuring there are no combustion system leaks and for an operation and maintenance plan. LAC 33:II.501.C.6 can be used only as "gap-filling" periodic monitoring; however, where an underlying rule such as NESHAP EEE already has work practice/monitoring requirements no additional conditions are necessary.</p> <p>Further, and without waiving the above position, PPG notes that the word "eliminate" should not be used in the context of any LDAR program under 501.C.6. The more appropriate word is "minimize". Section 501.C.6. does not give the authority to impose substantive work practice standards such as a requirement to eliminate leaks would be. It only authorized DEQ to provide gap-filing MRR to assure compliance with emission standards and work practice standards that have already been adopted through appropriate rulemaking.</p>	<p>The cited two requirements are combined into one requirement.</p>
Specific Requirement 7	<p>At the end of the first sentence, the words "this furnace" should be replaced with the words "these incinerators" to improve clarity of the requirement.</p>	<p>Wording correction is made as requested.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 12-18, 32-38, and 47-53	These specific requirements should be omitted from this permit.	The cited requirements are not HON Subpart H requirements for process fugitive emissions. They are leak inspection provisions for closed-vent systems. These requirements stay.

From the Air Permit Briefing Sheet of this draft permit:

The incinerators, halogen acid furnace, and thermal oxidizer in this permit have sealed combustion chambers. The vent and process lines are not included in this permit. They are part of the chemical manufacturing process units (EDC, TE-2, Vinyl Chloride Production, and others), which are subject to Leak Detect and Repair (LDAR) of 40 CFR 63 Subpart H. 40 CFR 63 Subpart H does not apply to the emissions covered in this permit, which does not include any affected fugitive components.

PPG agrees with the above statement, which means that these specific requirements for LDAR are not applicable to the Incinerators permit. Instead, these LDAR requirements apply to the CMPUs that are covered by PPG's other Title V permits. The NESHAP HON provisions require LDAR components to be assigned to specific CMPUs. PPG had done so and all of its LDAR reporting is set up by CMPU. There simply are no components subject to HON covered by the Incinerators Title V permit because all components are assigned to CMPUs subject to PPG's other existing and issued Title V permits.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 22	PPG requests that this requirement be labeled as state-only. This requirement is not a federally applicable requirement under the Clean Air Act. It is a condition of PPG's TSCA permit; but it is not required to be stated in this Title V permit by any federal law. Thus, including it in this permit is a state-only condition.	Since a condition of TSCA permit is not required to be included in the Part 70 operating permit. This requirement is deleted from this permit.
Specific Requirements 23 and 26	PPG requests that one of these two SRs be deleted as they are duplicative, and that the other SR be revised to read as follows:	The cited two requirements are combined into one requirement.

"Until the applicable compliance date for 40 CFR Part 63, Subpart EEE, EQT No. 346 shall be visually inspected at least daily for leaks, spills, and signs of tampering. Problems shall be addressed to minimize any fugitive emissions. Records shall be maintained onsite and available for inspection by the administrative authority. State-only [LAC 33:III.501.C.6]"

As noted above, without waiving its request to revise the above condition, at a minimum the word "eliminate" should be changed to "minimize".

Permit Reference	Air Permits Division Response (for official use only)
Remarks	
Specific Requirement 24	<p>The conditions in this SR were intended to convert the existing state-only operating conditions for the No. 3 HAF unit into Tempo format. However, the requirements for the AWFCO for CO drifting out of range erroneously proposes a 15 min. averaging period rather than the 60 min. averaging period in the existing permit.</p> <p>Also, the No 3 HAF will become subject to the NESHAP EEE rule by the applicable compliance date (currently October 14, 2008), and will be required to submit a Notification of Compliance Status containing operating parameter limits to assure compliance with Subpart EEE. At that time, these state only operating limits should no longer apply. For these reasons, PPG requests that this SR be rewritten as follows:</p> <ol style="list-style-type: none"> 1. Before "When processing liquid waste," insert "Until the initial NOC for compliance with 40 CFR Part 63, Subpart EEE is submitted," ... 2. Revise the last sentence to read as follows: "The hazardous waste liquid feed shall be automatically cut off if the stack CO concentration drifts out of the range for any continuous 60 minute period or if the O2 concentration drifts out of the range for any continuous 15-minute averaging period." State only. [LAC 33:III.501.C.6]

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 25	As the No 3 HAF will become subject to the NESHAP EEE rule by the applicable compliance date (currently October 14, 2008), and will be required to submit a Notification of Compliance Status containing operating parameter limits to assure compliance with Subpart EEE. At that time, these state only operating limits should no longer apply. For these reasons, PPG requests that this SR be rewritten by inserting the following at the beginning of the SR: "Until the initial NOC for compliance with 40 CFR Part 63, Subpart EEE is submitted,..."	The requirement is revised as requested.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 29 and 45	<p>These SRs do not state applicable averaging periods for these operating parameters as does the existing permit (which refers to the averaging periods in the NOC).</p> <p>Further, these operating parameter limits are those required to be included by PPG in its NOC for each of these units for NESHPAP Subparts F, G, and H compliance. PPG believes that it is a better practice for LDEQ to state the SR as a requirement to comply with the current NOC rather than to state specific operating parameter limits. The permit could either reference or attach the most recent NOC. This makes revision of the permit more streamlined and in accordance with the NESHPAP Subpart A rules for an NOC. For these reasons, PPG requests that the SR be restated as follows:</p>	<p>The averaging periods shall be established by PPG and approved by the Office of Environmental Assessment, Engineering Division. The approved averaging periods can then be incorporated into the permit.</p> <p>Note that the operating parameter limits are different between 40 CFR Part 63, Subpart G and 40 CFR Part 63, Subpart EEE.</p>
Specific Requirement 30	<p>"Comply with the operating parameter limits required by 40 CFR 63.114(e) as stated in the most current Notification of Compliance status required by 40 CFR 63.9. The minimum data availability requirements for the monitoring of such operating parameters shall be in accordance with 40 CFR 63, Subparts A and G." [40 CFR 63.114(e)]"</p> <p>PPG requests that this SR be revised by replacing "October 14, 2008" with "the applicable compliance date." That date is the currently applicable compliance date; however, there has been ongoing litigation concerning this rule and EPA could revise the date. Stating the "applicable compliance date" would avoid the necessity for a permit revision should the date change.</p>	<p>The requirement is revised to: Phase II source. Shall comply with 40 CFR 63 Subpart EEE by October 14, 2008 or by the revised compliance date if applicable.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 54-56 and 58-59	These SRs all state site-wide facility requirements that are already contained in PPG's Complex Support Title V permit. Thus, they should be deleted from this permit.	PPG's Complex Support Title V permit is for the complex support facilities only, which do not represent site-wide.
Specific Requirements 60 – 99 and 105-108.	PPG requests that specific requirements 60-99 be omitted as they are duplicative of the conditions in the Emissions Rates Sheets and are not authorized by law. PPG did not request any emission caps, nor are any caps warranted given that there are TPY emission limits for each point source or activity group in the Emission Rate Sheets. Both individual Unit EIQ limits and unit wide limits are not necessary to comply with any state or federal standard applicable to the Incinerators Area. These limits are not authorized by LAC 33:III.501.C.6. as is cited as a basis for these in the permit. Section 501.C.6. allows imposition of MRR requirements to assure compliance with other substantive emission limits and work practice limits that have been adopted through rulemaking.	The Specific Requirements report format has been updated recently, which does not contain the total annual (TPY) emission rates any more.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirement 121	PPG requests that this requirement be deleted as this was a one time requirement in 1991 that PPG already complied with.	Including this requirement in the permit does not indicate that PPG is not in compliance with the provision.
Specific Requirement 152	The word "Area" is misspelled.	The typo is corrected.
Specific Requirements 123-142	PPG requests that LDEQ either delete these conditions or provide a new specific requirement stating that compliance with NESHAP Subparts A, F, G, H, and EEE, as applicable, constitutes compliance with the requirements of Specific Requirements 123-142. Virtually every one of these SRs duplicates or, in some cases, conflicts with the requirements of NESHAP Subpart A's detailed requirements for performance testing, notification, continuous monitoring systems, reporting, and recordkeeping. In some cases, the time periods or requirements in these Specific Requirements also duplicate or conflict with the requirements of NESHAP Subpart EEE. To avoid these potential conflicts, the federal provisions should control.	The cited requirements are the requirements of LAC 33:III:Chapter 51. LDQE will consider PPG's comments and determine if the requirements shall be revised or deleted.
Specific Requirement 152 And Statement of Basis	It is PPG's understanding that although the permit references 40 CFR Part 68, compliance with Part 68 will be enforced through PPG's site-wide Complex Support Title V permit. PPG requests that DEQ confirm this understanding in the Statement of Basis.	This permit include the control devices only, which would not have any accidental release of the substance regulated under 40 CFR Part 68. Therefore, the cited requirement only indicates that this is part of a facility (Lake Charles Complex) that is subject to the requirements of 40 CFR 68. However, PPG's Complex Support Title V permit is for the complex support facilities only, which do not represent the Lake Charles Complex.
Specific Requirement 153	PPG requests that this specific requirement be reworded to be consistent with the underlying federal regulation (40 CFR 70.5 (a)(1)(iii)) which states that a timely application is "one that is submitted at least 6 months prior to the date of permit expiration".	The language of this requirement has been updated.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Specific Requirements 153 - 155.	<p>PPG requests that these conditions be deleted because they are duplicative of Part 70 General Conditions, and are worded somewhat differently than are the General Conditions, raising the potential for confusion. There is no reason to repeat the General Conditions of the permit as specific requirements. This will prevent the use of updated General Conditions and/or will require more DEQ time and resources to modify the permit when General Conditions are updated. By putting them in 2 places in the same permit, both would require revision when there are updates.</p> <p>In the alternative, if these conditions are not removed, LDEQ should revise these conditions so the wording is exactly the same as the General Conditions.</p>	<p>The language of these requirements have been updated. Further changes to these requirements may be made in future with the change of rulemaking.</p>